

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Christopher Johnson, having been duly sworn, depose and state the following:

1. I have been a United States Postal Inspector since April 2013 and have completed 12 weeks of basic investigative training in Potomac, Maryland, which included various aspects of federal law enforcement including the investigation of narcotics-related offenses. I am currently assigned to the Washington Division Field Office Prohibited Mailing Narcotics assignment. I have been involved in numerous investigations related to the distribution of controlled substances. While conducting and participating in these investigations, I have prepared and executed search warrants resulting in the seizure of narcotics, contraband, and proceeds and assets of illicit activities. I have participated in interdictions and controlled deliveries related to narcotics investigations. As a result of my training and experience, I am aware that Priority Mail Express and Priority Mail services are regularly used by narcotic traffickers to ship controlled substances and bulk cash through the US Mail.

2. Based on the facts set forth in this affidavit, I believe that Michael GRAY has conspired with those known and unknown to distribute and possess with intent to distribute marijuana, a schedule I controlled substance, in violation of 21 U.S.C. § 841 and 21 U.S.C. § 846.

3. Since October 2017 and continuing through the present, law enforcement has been conducting an investigation regarding a large volume of suspicious Priority Mail parcels being mailed from various cities in California to addresses in Baltimore, MD. Investigators reviewed Postal Service databases and noticed that, since early 2017; over 200 suspicious parcels were mailed from California to a particular zip code—21223—in Baltimore. More specifically, the parcels were addressed to locations on a particular city carrier route (route C032) that is assigned to U.S. Postal employee William MCRAE. City carrier route C032 is delivered out of the Franklin

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Station Post Office 2401 Ashton St, Baltimore, MD 21223. A search of postal records revealed MCRAE was assigned to that particular route on the dates the parcels discussed below were delivered.

4. On or about November 14, 2017, investigators became aware of eight Priority Mail parcels en route to 1100 Hollins Street Baltimore, MD 21223. USPS records show the parcels originated in Sacramento, CA, were mailed on November 13, 2017, and were scheduled for delivery on November 15, 2017. Investigators intercepted three of the parcels. All three parcels had a return address of Vision Art Supply 197 Akron Dr, Winston Salem, NC 27105 and were addressed to Angela McCullen at 1100 Hollins St, Apt C, Baltimore, MD 21223. On November 15, 2017, investigators conducted surveillance on MCRAE's route. Investigators observed MCRAE make deliveries to 1100 Hollins Street Baltimore, MD 21223 but did not witness MCRAE deliver the five remaining suspicious parcels to the address. A search of USPS databases showed the parcels had nonetheless been scanned as delivered before MCRAE arrived at 1100 Hollins Street. On November 22, 2017, investigators obtained and executed federal search warrant on the three intercepted parcels. Each parcel contained approximately 1 kilogram of a green, leafy, plantlike substance that field tested positive as marijuana.

5. On or about January 5, 2018, investigators became aware of two Priority Mail parcels en route to 1100 Hollins Street Baltimore, MD 21223. USPS records show both Priority Mail parcels weighed approximately 10 pounds, originated in Sebastopol, CA. USPS records show the subject parcels were mailed on January 4, 2018, one was scheduled for delivery on January 8, 2018 and the other was scheduled for delivery on January 11, 2018. On January 8, 2018, investigators conducted surveillance on MCRAE's route. Investigators observed MCRAE park his USPS vehicle at the corner West Lombard and South Mount Streets. A short time later,

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investigators witnessed a silver Volvo bearing Maryland registration plate 9CB6166 pull up behind MCRAE's postal vehicle. MCRAE was observed passing a parcel to a black male later identified as GRAY. USPS records show that one of the suspicious Priority Mail parcels was scanned delivered at the same time and location where MCRAE was observed handing off the parcel. Postal records confirmed that the second Priority Mail parcel never arrived in the Baltimore district.

6. On or about January 30, 2018, investigators became aware of seven Priority Mail parcels en route to 1100 Hollins Street Baltimore, MD 21223. Six of the parcels weighed approximately 20 pounds and the seventh was a Priority Mail flat rate box weighing approximately 2 pounds. Investigators intercepted two of the Priority Mail parcels. Both parcels had a return address of Touch One Art Supply 314 Alexander Street Fayetteville, NC 28301 and addressed to Regina Lupinetti 1100 Hollins Street Baltimore, MD 21223. Investigators obtained and executed a federal search warrant on the two parcels. The parcels contained 1,005 grams and 6,750 grams respectively of a green, leafy, plantlike substance that field tested positive for marijuana.

7. None of the parcels discussed above appeared to have actually been delivered to 1100 Hollins Street, and GRAY has no known association with that address.

8. On November 15, 2018, investigators became aware of several suspicious parcels addressed to MCRAE'S route that fit the previous profile of those containing marijuana. On November 17, 2018, investigators removed five of the parcels from the mail stream. Investigators obtained and executed a federal search warrant on one of the suspicious parcels. That parcel was found to contain approximately 2,160 grams of a green, leafy, plantlike substance that field tested positive for marijuana. After searching the parcel and photographing the contents, investigators repackaged the parcel with the original contents, and then reintroduced all the parcels back into the mail stream.

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9. On November 20, 2018, investigators set up surveillance at the Franklin Station Post Office and on MCRAE'S postal route. At approximately 2:25 PM, law enforcement watched as GRAY pulled up behind MCRAE'S USPS vehicle. MCRAE was subsequently observed handing GRAY several parcels and placing them in the back seat of his vehicle. As GRAY entered the driver's seat, he was intercepted by law enforcement. The suspicious parcels, including the one that had law enforcement had searched and which contained the approximate 2 kilograms of marijuana, was recovered from GRAY's vehicle.

Conclusion

10. Based on the facts set forth above, your Affiant believes there is probable cause that Michael Gray conspired with MCRAE and others known and unknown to distribute and possess with the intent to distribute marijuana, a schedule I controlled substance, in violation of 21 U.S.C. § 841 and 21 U.S.C. § 846.


Christopher Johnson
United States Postal Inspector

Subscribed and sworn to before me this 21st day of November, 2018.


J. Mark Coulson
United States Magistrate Judge

FILED _____ ENTERED _____
LOGGED _____ RECEIVED _____

NOV 21 2018

AT THE
CLERK, U.S. DISTRICT COURT
BY _____